

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

Akeem Henderson, et al.

Plaintiffs;

v.

Willis-Knighton Medical Center

Defendant.

Case No. 5:19-CV-00163

Judge Elizabeth E. Foote

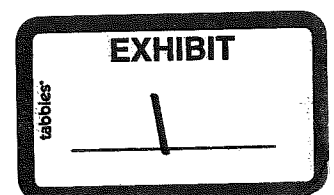
Magistrate Judge Mark L. Hornsby

DEFENDANT'S SUPPLEMENTAL RULE 26 DISCLOSURES

In compliance with this Honorable Court's Scheduling Order (Doc. 7) and Amended Scheduling Order (Doc. 19), and pursuant to Rule 26 of the Federal Rules of Civil Procedure, defendant Willis-Knighton Medical Center supplements its previous disclosures as follows:

I. Individuals Likely to Have Discoverable Information:

- **Jaqueline White, M.D.** – expert in emergency medicine. Dr. White practices at Northern Louisiana Medical Center in Ruston, Louisiana. Dr. White is expected to offer her expert opinion testimony regarding the medical treatment provided to the patient in the emergency department at Willis-Knighton South, as fully detailed in her expert report which will be produced in due course in accordance with the Court's Amended Scheduling Order.
- **Trish Koopman** – Ms. Koopman has knowledge of the Willis-Knighton South emergency department's medical records system. Ms. Koopman is expected to testify regarding several aspects of the electronic medical records system, including but not limited to the entering, correcting, closing, and obtaining of medical



records, audit trails, and the relationship between the MedHost and Meditech systems.

- **Tim Culpepper** – Mr. Culpepper has knowledge of the Willis-Knighton South emergency department's medical records system. Mr. Culpepper is expected to testify regarding several aspects of the electronic medical records system, including but not limited to the entering, correcting, closing, and obtaining of medical records, audit trails, and the relationship between the MedHost and Meditech systems.
- **Dr. Easterling, M.D.** – Dr. Easterling was previously disclosed as a fact and expert witness. Defendant supplements its previous disclosures to provide more specific information regarding Dr. Easterling's expected testimony. Dr. Easterling is a physician specializing in emergency medicine and non-retained expert witness who treated A.H. in the emergency department at Willis-Kington South. Dr. Easterling is expected to testify that his medical treatment was at all times within the standard of care, and that he did not discharge A.H. in unstable condition. Dr. Easterling is further expected to testify that he appropriately screened the patient, as reflected by the medical records and affirmatively plead by plaintiffs, and did not have any knowledge that the patient was suffering from an emergency medical condition at the time of discharge. Dr. Easterling is further expected to offer testimony in response to any opinions expressed by Plaintiffs' expert, Dr. Sobel, concerning his treatment of A.H.
- **Susan Rainer, RN** — Susan Rainer was previously disclosed as a fact and expert witness. Defendant supplements its previous disclosures to provide more specific

information regarding Ms. Rainer's expected testimony. Ms. Rainer is a registered nurse and treated A.H. in the emergency department at Willis-Knighton South. Ms. Rainer is expected to testify that the patient was screened, treated for her respiratory distress, and discharged in stable condition. Ms. Rainer is further expected to offer testimony in response to any opinions expressed by Plaintiffs' expert, Dr. Sobel, concerning the treatment she provided to A.H.

Respectfully Submitted,

/s/ Lamar P. Pugh

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the above has been forwarded via electronic mail to counsel of record for Plaintiffs, Sedric Banks, this 20th day of January, 2020.

/s/ Robert W. Robison, Jr.
ROBERT W. ROBISON, JR.